

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 19-CR-099

CHRISTOPHER C. GARDNER,

Defendant.

**PROTECTIVE ORDER REGULATING THE DISCLOSURE AND
USE OF DISCOVERY MATERIALS**

Upon the unopposed motion of the United States of America pursuant to Federal Rule of Criminal Procedure 16(d)(1), the Court finds that good cause has been established to enter a Protective Order regulating the use, dissemination, and disposition of information that may be disclosed during the proceedings in this case.

IT IS ORDERED THAT:

The Court agrees that a protective order as requested by the parties will serve the government's interest in maintaining the personal and sensitive information of witnesses and third parties while permitting the defense to understand the government's evidence. Accordingly, the discovery containing unredacted personal identifying information that the government will provide to defense counsel in the above-captioned case will be subject to this Protective Order, as follows:

a. For purposes of the Protective Order, the term "Personal Identifying Information" ("PII") includes any information that can be used to identify a person, including their address, date of birth, Social Security number, driver's license number,

telephone number, account number, or personal identification number. The term “PII Protected Information” refers to materials containing PII that the government produces to the defense pursuant to the Protective Order.

b. Defendant and defense counsel shall only use the PII Protected Information to prepare a defense in this case, including investigation, trial preparation, trial, and appeal. The PII Protected Information shall not be used for any other purpose, or in connection with any other proceeding, without further order of this Court. The defense attorneys may make copies of the PII Protected Information as necessary to prepare a defense in this case. All PII Protected Information, including necessary copies, shall remain under the control of the defense attorneys. PII Protected Information, while in the control of the defense attorneys, may be reviewed by the defendant, licensed investigators employed by the defense attorneys, and any other individuals deemed necessary by the defense attorneys. Before providing materials to an authorized person, defense counsel must provide the authorized person with a copy of this Order.

c. The defense team shall maintain PII Protected Information safely and securely and shall exercise reasonable care in ensuring the confidentiality of those materials by (1) not permitting anyone other than defense team members and defendant as restricted above to see PII Protected Information, (2) not divulging to anyone the contents of PII Protected Information, and (3) not permitting PII Protected Information to be outside the defense team’s offices, homes, vehicles, or personal presence.

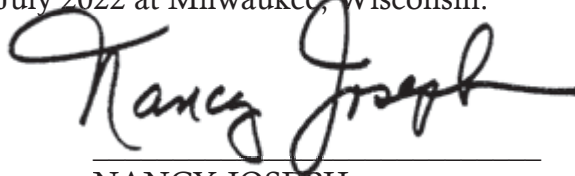
d. The parties also agree that any PII Protected Information produced in the course of discovery in the above-captioned matter prior to the date of the Protective Order shall be subject to the terms of the Protective Order.

e. PII Protected Information shall not be included in or attached to any public filing with the Court, and instead shall be filed under seal (except if the defendant chooses to include in a public document confidential information relating solely and directly to the defendant), unless consent to filing in the public record is given in writing by an attorney for the United States.

f. All materials produced or copied under the Protective Order must be returned to the United States Attorney's Office at the conclusion of the case or any direct appeal. Unless otherwise ordered above, the discovery materials shall not be physically relinquished to any third party, including clients, investigators, or any other individual.

g. Nothing contained in this Protective Order shall preclude any party from applying to this Court for further relief or for modification of any provision hereof.

SO ORDERED this 21st day of July 2022 at Milwaukee, Wisconsin.

A handwritten signature in black ink, reading "Nancy Joseph", written over a horizontal line.

NANCY JOSEPH
United States Magistrate Judge